

RESPONSE

At the time of the July 16, 2007 Office Action claim 4-7 were pending. The Examiner rejects claims 407. The Examiner's rejections are based on the following:

Claims 4 and 5 under §102(b) as being anticipated by United States Patent 5,402,326 to Belliveau (the "**US326**" patent); and

Claims 6 and 7 under §103(a) as being unpatentable over '326 in view of German Patent DE 2,263,689 to Niethammer (the "**DE689**" patent).

Applicant has reviewed the **US326** and **DE689** references and have amended the claims to traverse these rejections.

Section 102 – US'326

In the July 16 2007 Office Action the Examiner rejected claims 4 and 5 as being anticipated by the **US326** patent. **US326** teaches a device that allows for the replacement of gobos in preexisting sun and plant gear drive gobo changers. In the device taught by **US326** the gear train is contemplated to remain in tact and only the gobos are changed in and out of the central cylinder of the sun gears enabled by the removal of a bias spring 96. See col. 5 beginning at line 58:

within gobo holder 54. When it is desired to remove or replace gobo 87, bias spring 96 is simply slightly flexed so that its outer end moves past at least one overhang 98 60 and out of cylindrical bore 88. Bias spring 96 may then

In **US326** the bias spring 96 is the only flexible component of the gobo changer. All other components are rigid.

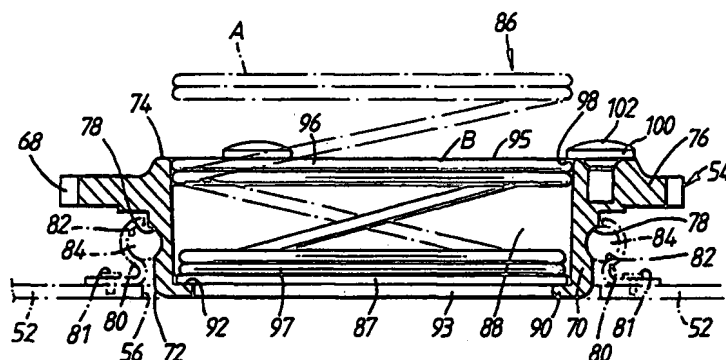
In practice in order to remove or replace a gobo in **US326**, the spring needs to be removed with either a tool or possible by hand (depending on the spring tension and the finger strength of the technician) and then the gobo must be directly handled by hand or a tool to avoid touching the gobo. The technician typically has a minimum of three (3) but more typically five (5) or more individual pieces to handle and the gobos themselves are handled directly. These limitations can prove to be significant particularly when the unit in which they are installed are mounted on a tall ceiling or 30 feet in the air in trussing

which is the common working environment for automated luminaries. While *US326* presented an improvement over the prior art of its day. The present invention takes a uniquely different approach to solving the problem which has several advantages over the system described in *US326*.

The present system is one in which an entire planetary arrangement is replaced quickly and more easily than the change of a gobo in *US326*. One advantage is that no tools are required. A second advantage is that only two parts and no tools are needed to replace the gobo segments: the original segment and the replacement segment. A third advantage is that the gobos are held by their planetary gear segment so they do not need to be handled directly. The gobo is handled by its planetary gear segment.

The Examiner cites the fasteners 81 which are used to fasten the planetary gear outer bearing raceway 80 directly to the carrier as the “holder”. The Examiner cites the outer circumference of the planetary gears 76 as the lamella. These Examiner’s analogy of components fail for a number of reasons.

First of all the fasteners 81 in *US326* is not flexible . . . they are ridged. They are described in *US326* to be any conventional fastening means such as a pop rivet or screws. Pop rivets are not removable and given the configuration of the system shown in *US326* the screws 81 could not easily be removed either. See Figure 5.



In fact they are not contemplated to be used in a manner that would easily allow replacement of a gobo. There is no suggestion anywhere in *US326* that part 81 is

involved in any way in the process of changing out the gobos. To the contrary, *US326* is very specific (as cited above) regarding how the gobos are changed and the rivets/screws /80 have no role in this process. *US326* teaches away from using part 81 from being the “removably” mechanism for changing the gobos.

Additionally there is no teaching or disclosure in *US326* to suggest that the fasteners 81 be flexible. The claims have been amended to include this limitation.

Section 102 – US’326

Unfortunately the applicant does not understand why the examiner cites *DE689*. The *DE689* reference has no flexible member for holding a lamella carrying a rotating gobo. In fact it has **no** flexible member whatsoever. It does have fingers for holding down optical devices in a fixed manner but does not disclose that the fingers could be flexible so that the optical elements could be easily replaced.

The examiner than suggests that the configuration of *DE689* could be used in combination with *US326* “to more securely hold the gobos”. The present claims include the limitation that the holders hold the segments by their lamellas. While it may be true that adding the holders of *DE689* to the hold part 76 in *US326* which the Examiner cites to be lamellas, it would do so at the cost of compromising the movement of the planetary gear drive preventing the rotation of the gobos. In other words, the results of the combination suggested by the Examiner would render the device un functional , thus teaching away form making the combination.

* * *

The applicants believe that the foregoing fully responds to all outstanding matters, respectfully submit that all remaining claims are in condition for allowance, and respectfully request that a timely Notice of Allowance be issued so the present application may swiftly pass to issuance.

Should the Examiner have any questions or desire clarification of any sort, or if it would facilitate a fair and efficient favorable disposition, the Examiner is invited to

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Atty. Docket No.: ROBE001US0
Customer ID No.: 58417
Appl. No.: US10/534,927

telephone the undersigned at the number listed below to schedule a telephone conference to discuss the application. Please reference Attorney Docket No. cited above.

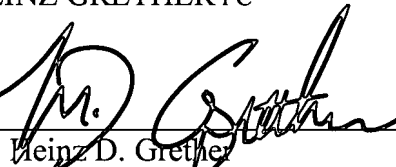
While Applicants believe no extension nor any fee is due with the transmission of this Amendment, if any extension or fees are due, such extension is hereby requested.

RESPECTFULLY SUBMITTED,
HEINZ GRETHER PC

Date: 16 October 2007

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